Before the
UNITED STATES COPYRIGHT ROYALTY BOARD
Washington, D.C.

In the Matter of:)	
)	
DETERMINATION OF RATES)	**Docket No. 21-CRB-0001-PR**
AND TERMS FOR MAKING AND)	**(2023-2027)**
DISTRIBUTING PHONORECORDS)	
(*Phonorecords IV*))	
)	

DECLARATION AND CERTIFICATION OF CHRISTOPHER M. YOUNG
REGARDING RESTRICTED MATERIALS

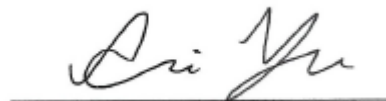**(On behalf of Amazon.com Services LLC)**

1.   I am an associate at Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C., counsel for Amazon in the above-captioned proceeding.

2.   I respectfully submit this declaration and certification pursuant to the terms of the Amended Protective Order dated November 4, 2021 ("Protective Order"). I am authorized by Amazon to submit this Declaration.

3.   I am familiar with Amazon's Opposition to Copyright Owners' Motion to Compel Amazon to produce Documents and Information, including the accompanying Declaration, Appendices, and Exhibits (collectively, "the Opposition").

4.   I have reviewed the definitions and terms provided in the Protective Order. After consultation with my client, I have determined to the best of my knowledge, information and belief that the Opposition contains information that Amazon has designated as "confidential information" as defined by the Protective Order ("Amazon Protected Material").

5.   Such Amazon Protected Material includes, but is not limited to, highly confidential internal business information that is proprietary, not available to the public, and commercially sensitive.

6.   If this highly confidential internal business information were to become public, it would place Amazon at a commercial and competitive disadvantage, unfairly advantage other parties to the detriment of Amazon, and jeopardize its business interests.

7.   In addition to the Amazon Protected Material, Amazon is bound under the Protective Order to treat as "Restricted" information designated "Confidential Information" by other participants in the proceedings. The Opposition contains information that the Copyright Owners have designated as "Confidential Information." Amazon is treating that information as "Restricted" and redacting such information in accordance with the terms of the Protective Order. Amazon reserves all rights and arguments as to whether such information is, in fact, "Confidential Information."

Pursuant to 28 U.S.C. § 1746, I hereby declare under the penalty of perjury that, to the best of my knowledge, information and belief, the foregoing is true and correct.

Dated: March 30, 2022
          Washington, D.C.

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Counsel for Amazon.com Services LLC

Proof of Delivery

I hereby certify that on Wednesday, March 30, 2022, I provided a true and correct copy of the Amazon's Declaration and Certification of Christopher M. Young Regarding Restricted Materials to the following:

Pandora Media, LLC, represented by Benjamin E. Marks, served via ESERVICE at benjamin.marks@weil.com

Zisk, Brian, represented by Brian Zisk, served via ESERVICE at brianzisk@gmail.com

Spotify USA Inc., represented by Joseph Wetzel, served via ESERVICE at joe.wetzel@lw.com

Apple Inc., represented by Mary C Mazzello, served via ESERVICE at mary.mazzello@kirkland.com

Google LLC, represented by Gary R Greenstein, served via ESERVICE at ggreenstein@wsgr.com

Powell, David, represented by David Powell, served via ESERVICE at davidpowell008@yahoo.com

Joint Record Company Participants, represented by Susan Chertkof, served via ESERVICE at susan.chertkof@riaa.com

Copyright Owners, represented by Benjamin K Semel, served via ESERVICE at Bsemel@pryorcashman.com

Johnson, George, represented by George D Johnson, served via ESERVICE at george@georgejohnson.com

Signed: /s/ Joshua D Branson